

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

**IN RE:**

**Kyle Thomas Pope**

**Debtor.**

**Case No. 20-31637-SHB**

**Chapter 7**

**Judge Bauknight**

**SHANNON GREENE,**

**Plaintiff,**

**v.**

**KYLE THOMAS POPE,**

**Defendant.**

**Adv. Proc. No. 20-ap-03042-SHB**

**MOTION TO EXTEND DEADLINE TO FILE ANSWER TO COMPLAINT**

Comes the debtor(s), KYLE THOMAS POPE, by and through counsel, hereby moves this Court to extend the deadline to file an Answer until November 19, 2020. In support of its motion the Debtor will show the Court as follows:

1. This adversary case was filed on September 28, 2020.
2. Summons was Issued upon Defendant Kyle Thomas Pope on September 29, 2020, for which the Court entered October 29, 2020 as the deadline line for an Answer to be filed.
3. Debtor paid \$5,000 to counsel to represent him in the Chapter 7 proceeding and understood it would cover all matters related to the bankruptcy.

4. Debtor was informed by counsel that the \$5,000 did not include representation on the adversary proceeding and that an additional retainer, far in excess of the \$5,000, was required.

5. Debtor was not able to acquire other counsel until October 27, 2020

The Defendant respectfully requests this Court extend the deadline to file an Answer until November 19, 2020. Thereby, the Defendant is positive that no negative effect of a 21 day delay will impact the Plaintiff.

Respectfully submitted, October 28, 2020.

s/ William E. Maddox, Jr.  
William E. Maddox, Jr. BPR #017462  
William E. Maddox, Jr. LLC  
Attorney at Law  
Attorney for Debtor  
P.O. Box 31287  
Knoxville, TN 37930  
Phone: (865) 293-4953

#### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and exact copy of the foregoing **Motion To Extend Deadline To File An Answer To Complaint** has been served via U.S. Mail, postage pre-paid or by the Court's Electronic Case Filing System (ECF) to the following:

**United States Trustee  
Tiffany Dilorio  
Trial Attorney  
800 Market Street Suite 114  
Knoxville, TN 37902**

**USM**

**Thomas Lynn Tarpy**  
**Attorney for Plaintiff**  
**Tarpy, Cox, Fleishman & Leveille, PLLC**  
**1111 Northshore Drive**  
**Landmark Tower North**  
**Suite N-290**  
**Knoxville, TN 37919**

**ECF**

*s/ William E. Maddox, Jr.*  
William E. Maddox, Jr.